Executive Summary

In its December 20th, 1999 Notice of Inquiry in the Matter of Public Interest Obligations of Broadcast Licensees, the Federal Communications Commission asked, "Are there sufficient marketplace incentives to ensure the provision of programming responsive to community needs, obviating the need for additional requirements?" (Federal Communications Commission, 1999, p. 29). The Commission asked this question within the context of inquiring whether specific public interest programming obligations should be imposed upon digital television broadcasters.

In response to this question, this study investigated whether marketplace conditions affect the provision of public affairs programming by analog television broadcasters. This examination of the relationship between market conditions and public affairs programming in the analog television environment can provide insights into broadcasters' programming practices that can then be applied to the issue of public interest programming obligations in the digital realm. The central research question is: Does competition encourage the airing of public affairs programming?

This study first compared levels of public affairs programming across a random sample of 24 markets. Next, this study examined a random sample of 112 commercial broadcast stations in order to determine whether, when accounting for station characteristics and market size and demographics, competitive conditions affect the quantity of public affairs programming provided. In order to conduct these analyses, the broadcast schedules for each station included in the station and/or market samples were analyzed for the two-week period beginning on January 17th and concluding on January 30th, 2000. This study analyzed local public affairs programming alone, as well as local and non-local public affairs programming combined.

The primary results of these analyses were as follows:

- Within the 24 markets studied, there was an average of 6.52 hours of local public affairs programming per market during the two-week time period, and an average of 1.1 hours per commercial station.

- 0.3 percent of the total commercial broadcast time within these markets was devoted to local public affairs programming.

- When local and non-local public affairs programming were analyzed together, the average hours of public affairs programming per market increased to 21.2 (3.59 hours per station) during the two-week time period.

- 1.06 percent of the total commercial broadcast time within the studied markets was devoted to local and non-local public affairs programming.

- Competitive conditions, market demographics, and station characteristics had no significant effect on the quantity of local public affairs programming provided by individual broadcast stations.

- Competitive conditions were significantly related to the provision of local and non-local public affairs programming combined. Specifically, there was a significant positive relationship between the number of commercial broadcast stations in a market and the amount of public affairs programming that a station provides. The moderate level of explained variation (less than 25 percent), however, suggests that public affairs programming decisions are quite resistant to market conditions.

Overall, the results of this study suggest that broadcasters generally devote a very small fraction of their broadcast time to public affairs programming, and that marketplace incentives do not effectively motivate the provision of such programming, particularly in terms of locally produced public affairs programming.

Introduction

In its December 20th, 1999 Notice of Inquiry in the Matter of Public Interest Obligations of Broadcast Licensees, the Federal Communications Commission asked, "Are there sufficient marketplace incentives to ensure the provision of programming responsive to community needs, obviating the need for additional requirements?" (Federal Communications Commission, 1999, p. 29). The Commission asked this question within the context of inquiring whether specific public interest programming obligations should be imposed upon digital television broadcasters.

One traditionally prominent aspect of broadcasters' public interest obligations has been the provision of public affairs programming, particularly public affairs programming produced locally and/or addressing local interests and concerns (Federal Communications Commission, 1999). The Federal Communications Commission has defined public affairs programming as "programs dealing with local, state, regional, national or international issues or problems, documentaries, mini-documentaries, panels, roundtables and vignettes, and extended coverage (whether live or recorded) of public events or proceedings, such as local council meetings, congressional hearings and the like" (Federal Communications Commission, 1984, p. 172). The Commission traditionally has differentiated public affairs programs from news programs, which the Commission has defined as "reports dealing with current local, national and international events, including weather and stock market reports, and commentary, analysis, or sports news when they are an integral part of a news program" (Federal Communications Commission, 1984, pp. 171-172).

This study investigates whether marketplace conditions affect the provision of public affairs programming by analog television broadcasters. This examination of the relationship

between market conditions and public affairs programming in the analog television environment can provide insights into television broadcasters' programming practices that can then be applied to the issue of public interest programming obligations in the digital realm. The central research question is: Does competition encourage the airing of public affairs programming? If the provision of public affairs programming is responsive to market conditions, then government efforts to encourage its production may be unnecessary. If, however, the provision of public affairs programming is not responsive to market conditions, then government action may be necessary to ensure the availability of such programming.

Methodology

This study is divided into two sections. The first section presents a descriptive analysis of public affairs programming provided by commercial television stations in 24 randomly selected Nielsen television markets. These 24 markets represent approximately ten percent of the 211 television markets in the United States. These markets are analyzed in terms of the overall levels of public affairs programming available across markets of various sizes. The second section examines the programming patterns of individual broadcast stations. This section involves a quantitative analysis of the determinants of the quantity of public affairs programming provided by a random sample of 112 commercial television stations.[1] These 112 stations represent approximately ten percent of the roughly 1,200 commercial television stations licensed in the United States. This analysis examines whether individual station characteristics, market demographic factors, and competitive conditions affect the quantity of public affairs programming provided.

In order to conduct these analyses, the broadcast schedules for each station included in the

station and/or market samples were analyzed for the two-week period beginning on January 17th and concluding on January 30th, 2000. This two-week period appears reasonably representative of a typical two-week broadcast period. This period represents the heart of network broadcasting "season" (which runs roughly from September through May). In addition, none of the 14 days studied falls into any of the four one-month "sweeps" periods, in which programming strategies and practices typically deviate from the norm in an effort to boost ratings. During sweeps periods, it is more likely that public affairs programming will be preempted (Moonves, 1998). Given that sweeps periods comprise a full third of the broadcast year and that no sweeps days are included in the time period studied, however, it is possible that this data set overestimates the amount of public affairs programming that would be found if 14 days were randomly sampled throughout the year.[2]

A second possible bias to this data set is the selected time period's proximity to presidential primaries. This factor also may artificially inflate the quantity of public affairs programming presented. An examination of the data gathered, however, revealed very few programs devoted specifically to the presidential campaign. Moreover, only one sampled market (Boston) was in close proximity to either of the states (Iowa and New Hampshire) that held a caucus or primary election close to the studied time period. In sum, the time period studied is likely to be very representative of typical commercial broadcaster behavior.

For the 24-market analysis, a list of all commercial television stations located in each of the 24 randomly sampled markets was compiled using the third edition of the 1999 Investing in Television Market Report, published four times a year by BIA Research. The Investing in Television Market Report (1999) provides the city/town of license for each station designated as

falling within the Nielsen Designated Market Area. The appropriate zip codes were then obtained through the U.S. Postal Service's web site (**www.usps.gov**).

The next step required obtaining program schedules for each of the commercial broadcast stations. This was accomplished using ClickTV (**www.clicktv.com**), a national television schedule database provided by TV Data, one of the nation's leading providers of television program schedule information (see **www.tvdata.com**). ClickTV provides zip code-based searching of broadcast, cable, and satellite television schedules. The ClickTV database covers 24 hours per day and encompasses programs as short as 15 minutes in length. The relevant station zip codes were entered in order to produce the corresponding program schedules for the two-week time period.[3]

These program schedules were then keyword-searched, using the term "public affairs." "Public affairs" is one of the program type designations used by ClickTV to identify programs. It is important to note that the "public affairs" program type designation is not only used independently, but also in conjunction with other program type designations (e.g., "public affairs/legal" or "public affairs/community"). Thus, it is unlikely that a keyword search using the "public affairs" terminology failed to produce scheduled public affairs programs. Indeed, preliminary exploration of the ClickTV database produced no instances in which related program categories, such as "community" or "legal" were used without being linked with the "public affairs" category. In addition, exploration of the database produced no instances in which programs clearly representative of the "public affairs" category were classified under a different program type. There were, however, instances in which programs that did not meet the FCC's criteria for "public affairs" programming (described above) were classified as such (primarily

religious and agricultural programs). These programs were excluded from the data set.

The ClickTV listings contained the following information about the programs: (a) time of broadcast; (b) station call letters/channel; (c) program length (in minutes); and (d) brief descriptive information. In those instances in which a program could not easily be confirmed by its title and/or description as a public affairs program, the station was contacted via telephone or e-mail, or the station's web site was consulted, in order to make a final determination as to whether the program was appropriately classified as a public affairs program. In each of these cases, deference was given to the programmers' own interpretations of whether or not the program was appropriately categorized as a public affairs program.

Although locally produced public affairs programs have often been the focus of communications policymakers, this study also approached public affairs programs more broadly, given that, in many instances, local programmers import public affairs programming from outside their market in an effort to appeal to particular audience segments within their community (e.g., importing foreign-language public affairs programs, or senior citizen-focused public affairs programs). As policymakers have noted on occasion, localism need not be expressed purely in terms of geography. Localism can also be expressed in terms of shared cultural values or interests (see Napoli, in press, Chapter Nine). Moreover, many public affairs programs are national network programs (e.g., "Meet the Press," "Nightline") or are nationally syndicated programs (e.g., "America's Black Forum"). Consequently, the analyses that follow examine both locally produced public affairs programming and public affairs programming in its entirety (local and non-local public affairs programming combined). The television stations or their web sites were consulted when necessary to clarify any instances in which it was unclear from a program's

description as to whether or not the program was a local public affairs program (i.e., produced within the market area).

Market Analysis

The sampled markets ranged in their rankings from number two (Los Angeles) to number 200 (Bend, Oregon). They ranged in size from 40,000 television households to over five million television households. These markets contained a total of 142 commercial television stations. The individual markets contained from one to 19 commercial television stations. These markets had an average household income of over 42 thousand dollars and an average cable penetration of approximately 68 percent. Both of these averages correspond very closely to national average figures, which provides a strong indication of the representativeness of the sample.

Descriptive information for the sampled markets is provided in Table One. As the table indicates, a total of 156.49 hours of local public affairs programming was presented during the two-week period. This averaged out to 6.52 hours per market and 1.1 hours per commercial station (156.5 hours/142 stations). These 156.5 hours represent 0.3 percent of the total broadcast hours studied (14 days x 24 hours x 142 stations). This percentage corresponds closely to previous research that focused on local public affairs programming (Benton Foundation, 1998). The amount of all forms of public affairs programming (local and non-local) totaled 509 hours, for an average of 21.2 hours per market and 3.59 hours per station. These 509 hours represent 1.06 percent of the total broadcast hours studied.

Table Two provides a market-by-market breakdown of public affairs programming hours. This table lists the hours of local and total (local + non-local) public affairs programming in each of the markets studied (columns 2 and 5). As the table indicates, Los Angeles contained the

greatest amount of public affairs programming (in terms of both local and total public affairs programming). A number of the smaller markets (e.g., Topeka, KS, Watertown, NY, Marquette, MI) contained no local public affairs programming. Columns 3 and 6 represent the percentage of the total available broadcast hours (expressed as 24 hrs. x 14 days x N stations in the market) accounted for by each of these program categories. These numbers provide an indication of the overall amount of broadcast time devoted to public affairs programming. As the table indicates, the Joplin, MO/Pittsburg, KS market contained the highest percentage of total broadcast time (1.69 percent) devoted to local public affairs. The Joplin/Pittsburg measure is significantly higher than the norm because the Joplin/Pittsburg market contains a relatively small number of commercial television stations (three), but one or more of these stations devotes a larger than average amount of time to local public affairs programming.

Finally, in columns 4 and 7 the hours of local and total public affairs programming presented in each market are divided by the number of commercial television stations in the market in order illustrate the average hours of public affairs programming per station in each market. Markets with the highest per station averages for local public affairs programming are Joplin/Pittsburg (5.67 hrs./station), Los Angeles, (2.48 hrs./station), and Flint, MI (2.00 hrs./station). The lowest-ranking markets in this category include Topeka, KS, Watertown, NY, and Marquette, MI (all with zero hours/station), as well as Savannah, GA and Lansing, MI (.20 hrs./station). In terms of total public affairs programming (local + non-local), the best performing markets were Joplin/Pittsburg (8.67 hrs./station), Tampa, FL (5.54 hrs./station) and Salisbury, MD (5.00 hrs./station). Low ranking markets included Mankato, MN, (1.00 hrs./station), Houston, TX (2.03 hrs./station), and Reno, NV (2.28 hrs./station).

The central research question of this study was whether the quantity of public affairs programming varies according to market conditions. Figure One is a graph of the total hours of local public affairs programming available in each market during the two-week period studied. As the graph indicates, there is a general pattern of greater availability of local public affairs programming in larger markets (Joplin/Pittsburg being the visibly notable exception). When total hours of combined local and non-local public affairs programming are graphed across markets (see Figure Two), a similar pattern emerges, with larger markets generally offering more total hours of public affairs programming.

Table Three presents a means comparison between top 100 markets in the sample and markets outside the top 100. As the table indicates, in terms of local public affairs programming, and in terms of total public affairs programming (local + non-local), there are significant differences in the mean hours of programming between markets within and outside the top 100 (local: $F = 3.53$; $p < .10$; total: $F = 7.53$; $p < .05$). These results are not surprising given that larger markets generally have more commercial television stations. Thus, viewers in larger markets will generally experience a greater availability of public affairs programming.

These analyses do not, however, provide a direct indication of the behavior of individual stations within these markets. That is, how do market conditions affect the amount of public affairs programming provided by individual stations? A key question raised by the FCC's Notice of Inquiry is whether market conditions are sufficient to promote the airing of public affairs programming (Federal Communications Commission, 1999). Certainly larger markets will likely have more aggregate hours of public affairs programming than smaller markets, due to the increased number of broadcast stations. However, such a pattern tells us little about how market

conditions affect the programming decisions of individual broadcast stations.

In a first step toward investigating this issue, Figure Three provides a graph of the mean hours of local public affairs programming per station, according to market size. As the figure indicates, there does not appear to be a very strong relationship between market size and the hours of local public affairs programming (although there does appear to be a slight tendency toward more local public affairs hours per station in larger markets). There is less indication of any pattern when local and non-local public affairs hours are combined and graphed against market size (see Figure Four). These results suggest that market size and, by association, the level of market competition,[4] may not be significant factors affecting the public affairs programming decisions of commercial broadcast stations.

Station Analysis

In order to investigate this issue more thoroughly it is necessary to look beyond markets as the unit of analysis and examine the behavior of individual stations. In order to do so, a random sample of 112 commercial broadcast television stations was generated and analyzed.[5] The same procedure that was used to gather program and market information in the market sample was used to gather information for the station sample; however, additional market and station data were incorporated from BIA's (1999) Investing in Television Market Report. This data set includes information on the size (in terms of television households), average annual household income, and minority population[6] of each station's market. This information was gathered in order to account for the possibility that the size and wealth of a station's market affect the amount of public affairs programming a station provides (see Federal Communications Commission, 1984, Appendix C), as well as for the possibility that minority populations factor

into public affairs programming decisions. Larger audience bases may translate into a greater diversity of viewer interests, and hence, more public affairs programming. Wealthier markets may also be markets with higher average education levels, which may translate into greater viewer demand for public affairs programming. Finally, larger minority populations may translate into more public affairs programming given that many programs labeled as "public affairs" programs are specifically oriented toward minority audiences and concerns (e.g., "America's Black Forum").

Information was also gathered on the competitive conditions in each station's market (e.g., cable penetration, number of public television stations, number of commercial television stations). These measures were obtained in order to test whether the intensity of competition for television audiences affects the levels of public affairs programming that commercial broadcasters provide. For instance, greater presence of cable or public television may discourage commercial broadcasters from airing public affairs programming due to its availability via these alternative outlets, or it may encourage public affairs programming if broadcasters elect to compete with cable and public television for public affairs viewers. Greater numbers of commercial broadcasters in the market may have similar affects on the programming decisions of individual broadcasters.

Finally, information on individual station characteristics (e.g., estimated annual revenues,[7] VHF or UHF, network affiliation), was gathered in an effort to account for additional potential explanatory factors for variation in the quantity of public affairs programming. For instance, network affiliates may be less inclined to air local public affairs programming due to the quantity of broadcast time they defer to the networks. On the other hand, network affiliates may air more

non-local public affairs programming due to their commitment to airing network-produced public affairs programming such as "Nightline" and "Meet the Press." Similarly, revenues may factor into a station's decision to produce public affairs programming, with wealthier stations perhaps more likely to incur the expense of producing local public affairs programming (Federal Communications Commission, 1994, Appendix C). It is important to emphasize, however, that given the lack of previous research on this subject,[8] no specific hypotheses have been formulated regarding the relationships between the independent and dependent variables.

Overall, this sample of 112 stations included stations from 83 of the 211 television markets. As Table Four indicates, eighty-four of these stations (75 percent of the sample) are affiliates of one of the Big Four broadcast networks (ABC, NBC, CBS, FOX). Twenty-four stations (21.4 percent of the sample) are affiliated with one of the three smaller networks (WB, UPN, PAX). The remaining four stations (3.5 percent of the sample) are not affiliated with any of these networks. The VHF-UHF split is 50.9 percent UHF and 49.1 percent VHF.

These 112 stations aired a total of 118.8 hours of local public affairs programming during the time period studied. These 118.8 hours represent 0.3 percent of the total broadcast hours studied (14 days x 24 hrs. x 112 stations) and an average of 1.06 hours per station. The sampled stations aired a total of 409.46 hours of all forms of public affairs programming (local + non-local). These 409.46 hours represent 1.09 percent of the total broadcast hours studied and an average of 3.66 hours per station. These percentages and averages correspond very closely with those obtained for the market analysis (see above).

Local Public Affairs Programming

Table Five presents the results of a regression analysis with local public affairs hours as the

dependent variable. As the table indicates, the adjusted R^2 for this model is .03 ($p > .05$).[9] Among the independent variables, only the total number of commercial television stations in the market was significant at the .05 level (beta = .37; $p < .05$),[10] though of course the low R^2 indicates that this relationship is so weak as to be of no practical significance. The remaining competitive conditions indicators (cable penetration and the number of public television stations in the market) exhibited very weak relationships with the dependent variable. Neither of these variables was significant at the .05 level.

Overall, these results conform with the observations made in the market-level analysis -- that although larger markets provide a greater aggregate amount of local public affairs programming, individual stations do not respond to increasingly competitive market conditions by producing more local public affairs programming. Nor, for that matter, do they respond by reducing the amount of local public affairs programming they provide. Instead, public affairs programming appears to be unaffected by competitive conditions. The results also suggest that local public affairs programming is not a function of the size or demographic characteristics of the potential audience, nor is it a function of the basic attributes of the broadcast station. Thus, the provision of local public affairs programming appears highly resistant to economic influences.

Total Public Affairs Programming (Local + Non-Local)

A slightly different picture emerges, however, when public affairs programming is defined more broadly -- specifically, in terms of both local and non-local public affairs programming. Table Six presents the results of a regression analysis with total (local + non-local) public affairs program hours as the dependent variable. As the table indicates, the adjusted R^2 for this model is .23, which is significant at the .05 level ($p = .00$).[11] The total number of commercial television

stations is significant at the .05 level (beta = .46; $p < .05$). No other independent variables are significant at the .05 level, although the Big Four affiliate variable is significant at the .10 level (beta = .29; $p = .07$).[12] The significant positive coefficient for the number of commercial television stations in the market (beta = .46; $p < .05$) suggests that higher numbers of competing commercial television stations will compel commercial television broadcasters to increase the amount of public affairs programming they provide. Thus, when public affairs programming is defined more broadly (to include local and non-local public affairs programs), increased competition from other commercial television stations does have a modest positive effect on the amount of public affairs programming that commercial broadcasters choose to air. However, the fact that over 75 percent of the variation in public affairs programming remained unexplained by the model suggests that public affairs programming decisions are quite resistant to marketplace influences.

Conclusion

Overall, these results provide support for the notion that market incentives may not be sufficient to promote the provision of public affairs programming, particularly local public affairs programming. The availability of local public affairs programming was not significantly related to any of a variety of market and station characteristics. Only a modest relationship was found between competitive conditions (specifically, the number of commercial television stations) and all forms (local + non-local) of public affairs programming. It is possible that the relationship between competitive conditions and public affairs programming is stronger within the context of all forms of public affairs programming than within the context of local public affairs programming because stations are more likely to respond to competitive pressures (weak as they

may be) to provide public affairs programming by airing cheaper syndicated fare, rather than incurring the time and expense of producing their own programming.

Previous research, which studied, in the aggregate, a broader range of program types (news, local programming, and all forms of public affairs), found much stronger relationships between market and station characteristics and the amount of programming provided (Federal Communication Commission, 1984, Appendix C) than were found in this study, in which only public affairs programming was studied. These contrasting results suggest that public affairs programming, in particular, may be resistant to variation in station and market conditions.

As policymakers consider whether to impose specific public interest programming requirements upon digital broadcasters, the results presented here suggest that, at least in terms of public affairs programming, it is unlikely that market incentives will promote the production of such programming. If policymakers desire a level of public affairs programming in digital broadcasting that exceeds the levels currently available in the analog environment, then the institution of specific public affairs programming obligations may be necessary.

Of course, public affairs programming represents just one of many types of programming that have traditionally been associated with serving the public interest. Other types of programming, such as news, educational children's programming, and public service announcements, also contribute to the public service dimension of commercial broadcasting. The results presented here should not be generalized to these other forms of public interest programming.

1. Both the market and station samples were generated from listings in the third edition of BIA Research's (1999) Investing in Television Market Report.

2. Given the narrow time frame between the release of the Commission's Notice of Inquiry and the due date for comments, and the limited availability of searchable program schedules (see endnote three), it was not possible to study a sample of days throughout the broadcast year.

3. A maximum time period of two weeks is available on the ClickTV database at any given time.

4. In the sample of 112 commercial television stations, there is a very strong positive correlation ($r = .77$; $p = .00$) between the number of television households in a market and the number of commercial television stations in a market. There is also a strong positive correlation ($r = .62$; $p = .00$) between the number of television households in a market and the number of public television stations in a market. These correlations suggest that larger markets generally contain more competitors for television audiences.

5. This additional sample was generated and analyzed due to the fact that analyzing the individual stations contained within the market sample would not produce a sample of stations that was sufficiently generalizable to the population of television stations.

6. Minority population was measured by adding the percent Black, percent Asian, and percent Spanish-speaking statistics provided in the Investing in Television Market Report (BIA Research, 1999).

7. In incorporating station revenues as an independent variable, it was necessary to exclude from the sample those stations that did not report revenues in the Investing in Television Market Report (BIA Research, 1999). Only stations that reported revenues were included in the study due to the fact that previous research suggests that station revenues may be an important factor in

determining programming decisions (Federal Communications Commission, 1984, Appendix C). According to BIA Research (1999), almost 80 percent of stations surveyed reported their revenues (p. 6). This is a high level of participation that alleviates some of the concerns about potential non-response error affecting the results.

8. One notable exception is a study titled "An Empirical Study of the Determinants of News and Public Affairs and Local Programming Choices of Commercial Broadcasters," conducted in conjunction with the FCC's 1984 decision to eliminate specific requirements for public interest programming and included in Appendix C of that decision (Federal Communications Commission, 1984). As the title suggests, this study examined a much broader range of program types than the analysis presented here.

9. The Durbin-Watson statistic of 1.95 for this regression indicates no serial correlation problem.

10. Tolerance statistics and correlation coefficients indicated no significant multicollinearity problems among the independent variables nor were there any significant indications of non-linear relationships between any of the independent and dependent variables. Consequently, no variables have been combined or omitted, nor have any linear transformations been imposed on the data set.

11. The Durbin-Watson statistic for this regression is 1.85, indicating no significant serial correlation problem.

12. Although not significant at the .05 level, the positive relationship between hours of public affairs programming and Big Four network affiliation is worth discussing briefly. This relationship is due to the fact that Big Four network affiliates typically carry at least one weekly public affairs program ("Meet the Press" on NBC; "This Week," on ABC; "Face the Nation," on CBS; and "FOX News Sunday," on FOX). These weekly programs generally air in a Sunday

morning time slot. In many markets these programs receive an additional late-night airing (e.g., Monday at 2:30 AM), which further boosts the cumulative public affairs programming hours for Big Four network affiliates. In addition, ABC affiliates generally carry "Nightline" five nights per week.

Table One

Public Affairs Programming and Market Characteristic Data for Television Market Sample (N = 24)

	Min/Max	Sum	Mean
Local public affairs programming hours	0/47.2	156.49	6.52
Total public affairs programming hours	1/74.36	509.15	21.22
Average household income (000)	31.17/49.36	NA	42.31
Television households (000)	40/5135	NA	13473
Cable penetration (%)	55/82	NA	68.29
Number of commercial TV stations in market	1/19	142	5.92

Table Two

Market-by-Market Breakdowns of Local and Total (Local + Non-Local) Public Affairs Programming

	Local Public Affairs			Total Public Affairs		
Market (Rank)	Total Hours	% Broadcast Time	Hours/Station	Total Hours	% Broadcast Time	Hours/Station
Los Angeles, CA (2)	47.20	.74	2.48	74.36	1.16	3.91
Houston, TX (11)	12.50	.25	.83	30.50	.61	2.03
Tampa, FL (14)	14.00	.35	1.17	66.50	1.65	5.54
San Antonio, TX (37)	18.50	.55	1.85	34.00	1.01	3.40
Wilkes-Barre, PA (51)	3.00	.13	.43	20.00	.85	2.86
Flint, MI (64)	10.00	.60	2.00	23.00	1.37	4.60
Green Bay, WI (69)	2.00	.10	.33	16.00	.79	2.67
Syracuse, NY (54)	4.00	.20	.67	20.00	.99	3.33
Columbia, SC (86)	4.50	.27	.90	18.00	1.07	3.60
Burlington, VT (91)	4.30	.18	.61	18.30	.78	2.61
Colorado Springs, CO (94)	2.00	.12	.40	20.00	1.19	4.00
Savannah, GA (100)	1.00	.06	.20	15.00	.89	3.00
Springfield, MA (104)	1.00	.15	.50	9.00	1.34	4.50
Lansing, MI (106)	1.00	.06	.20	16.00	.95	3.20

Table Two Continued

Market-by-Market Breakdowns of Local and Total (Local + Non-Local) Public Affairs Programming

	Local Public Affairs			Total Public Affairs		
Market (Rank)	Total Hours	% Broadcast Time	Hours/Station	Total Hours	% Broadcast Time	Hours/Station
Reno, NV (108)	4.99	.21	.71	15.99	.68	2.28
Topeka, KS (140)	.00	.00	.00	12.00	.89	3.00
Medford, OR (143)	3.00	.15	.50	26.00	1.29	4.33
Joplin, MO (146)	17.00	1.69	5.67	26.00	2.58	8.67
Salisbury, MD (163)	1.00	.15	.50	10.00	1.49	5.00
Elmira, NY (171)	2.50	.25	.83	13.50	1.34	4.50
Watertown, NY (175)	.00	.00	.00	8.00	1.19	4.00
Marquette, MI (177)	.00	.00	.00	10.00	.99	3.33
Mankato, MN (187)	1.00	.30	1.00	1.00	.30	1.00
Bend, OR (200)	2.00	.30	1.00	6.00	.89	3.00

Figure One

Local Public Affairs Hours by Market

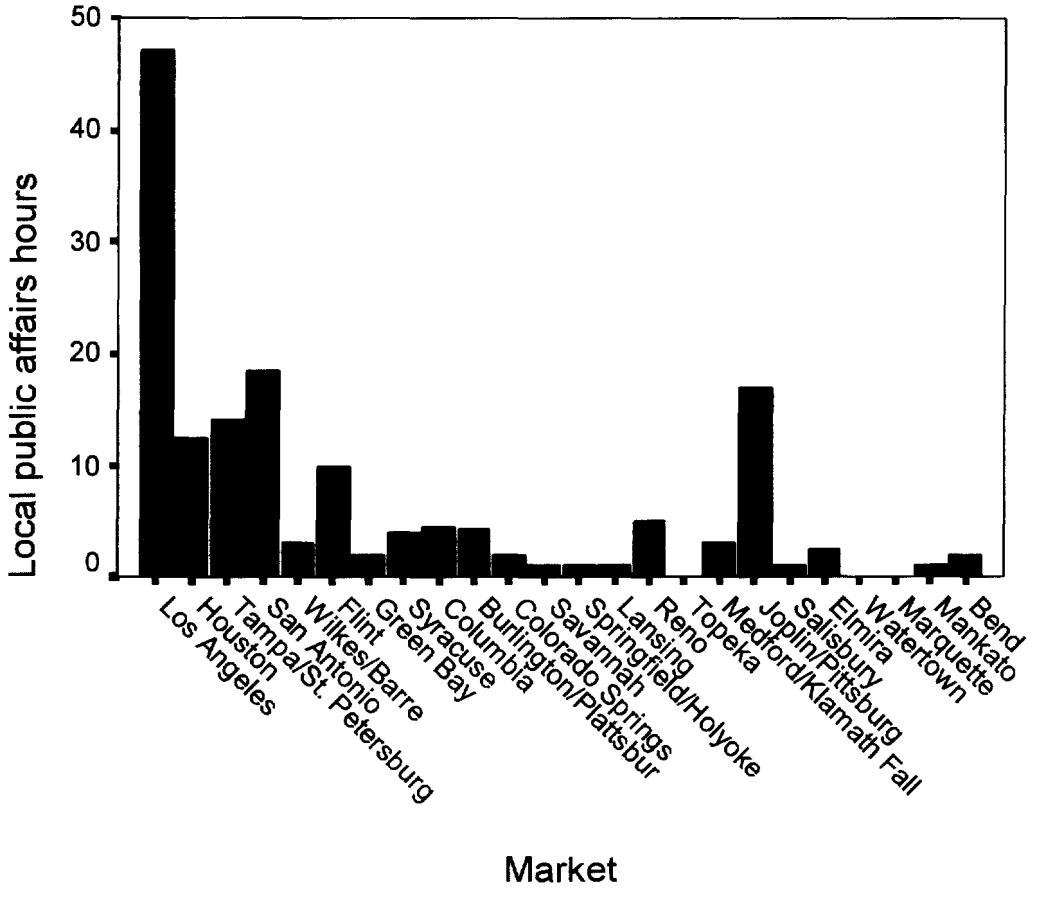

Figure Two

Total Public Affairs (Local + Non-Local) Hours by Market

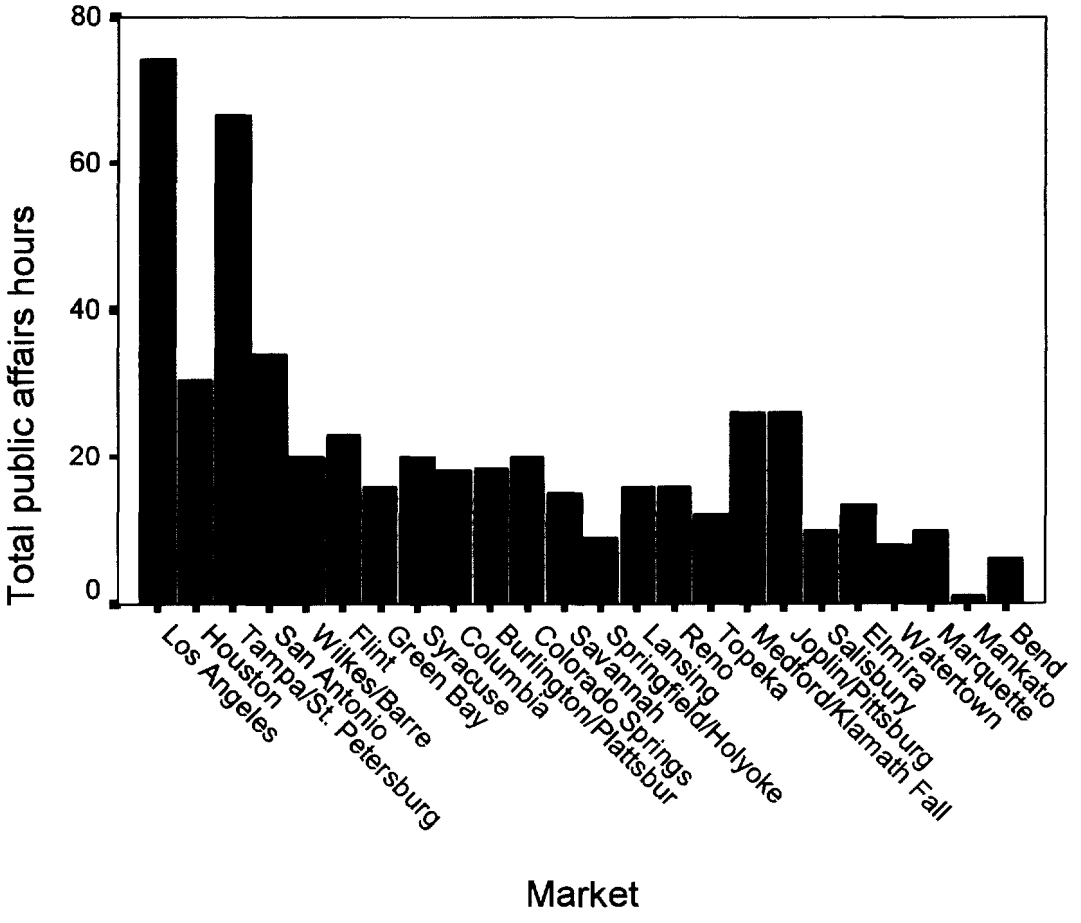

Table Three

Comparison of Mean Levels of Public Affairs Programming Between Top 100 and Non-Top 100 Markets (N = 24)

Local Public Affairs

	Mean	Std. Dev.	Cases
Within Top 100 Markets	10.25	12.91	12
Outside Top 100 Markets	2.79	4.71	12

$F = 3.53$ ($p < .10$).

Total Public Affairs

	Mean	Std. Dev.	Cases
Within Top 100 Markets	29.64	19.92	12
Outside Top 100 Markets	12.79	7.44	12

$F = 7.53$ ($p < .05$).

Figure Three

Local Public Affairs Hours Per Station by Market

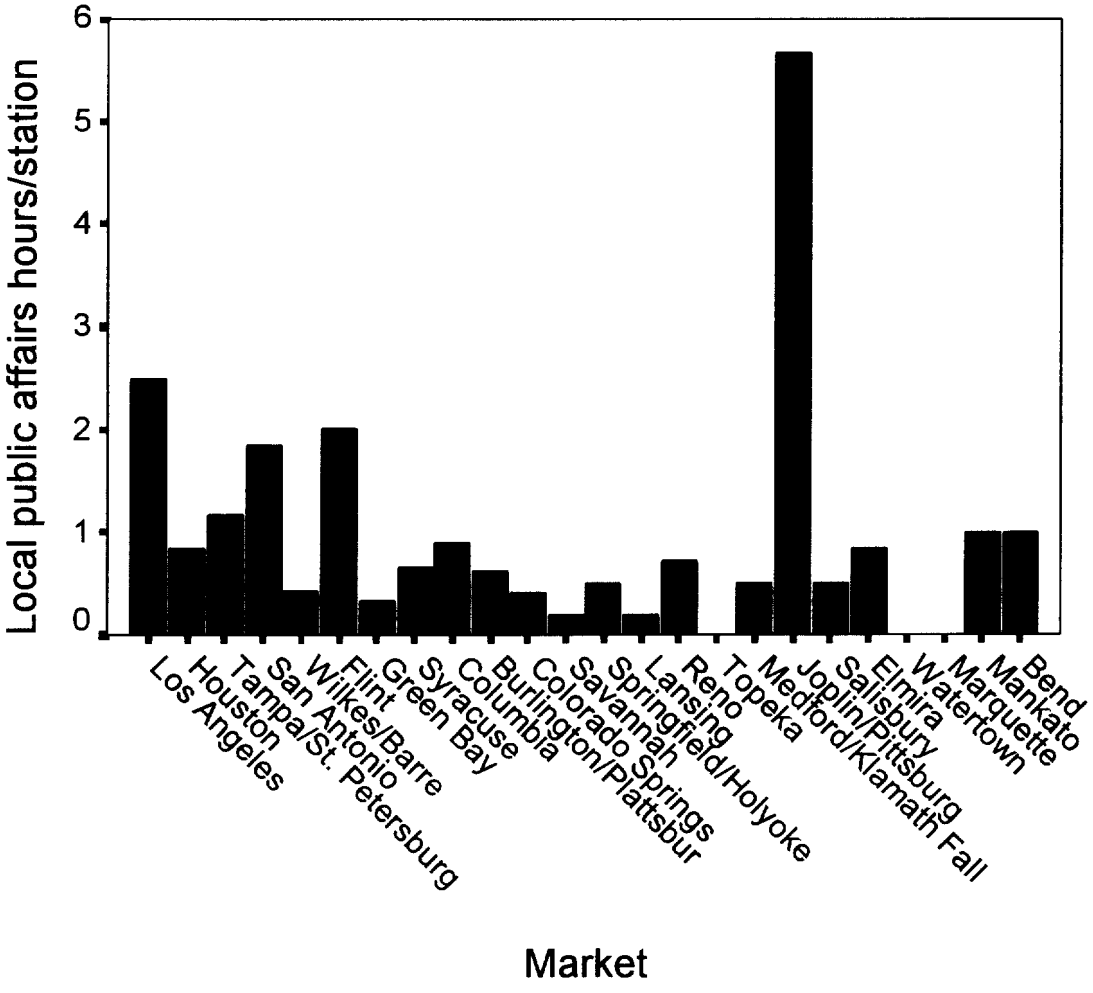

Figure Four

Total Public Affairs (Local + Non-Local) Hours Per Station by Market

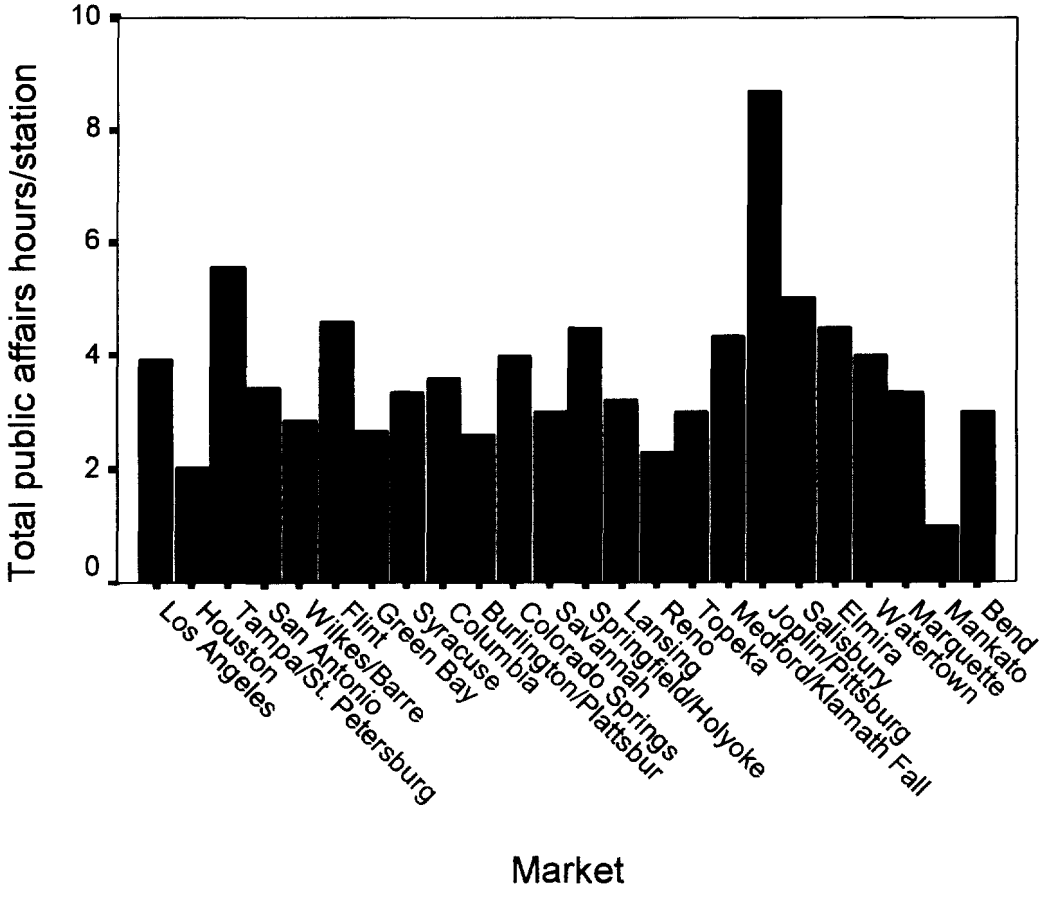

Table Four

Public Affairs Programming and Station Characteristic Data for Station Sample (N = 112)

Network Affiliation

	Number	Percent
Big Four Affiliate	84	75.0
Other Network Affiliate	24	21.0
Independent	4	4.0
Total	112	100.0

VHF/UHF

	Number	Percent
VHF	55	49.1
UHF	57	50.9
Total	112	100.0

Public Affairs Programming

	Min/Max	Sum	Mean
Local Public Affairs Hours	0/16	118.80	1.06
Total Public Affairs Hours	0/23	409.46	3.66

Table Five

Summary of Simultaneous Regression Analysis for Variables Predicting Hours of Local Public Affairs Programming (N = 112)

Variable	B	SE B	Beta
Station revenues (000)	.00001	.00	.19
UHF or VHF (0 = UHF; 1 = VHF)	.30	.55	.06
Big 4 affiliate (0 = No; 1 = Yes)	-.32	.96	-.06
Other network affiliate (0 = No; 1 = Yes)	-.53	.82	-.09
Television households (000)	-.001	.00	-.33
Average household income (000)	-.00002	.00	-.06
Minority population (%)	.001	.02	.01
Public TV stations	-.01	.22	-.04
Cable penetration (%)	.01	.03	.03
Commercial TV stations	.24	.11	.37*
Constant	.12	2.95	

Note. Adjusted $R^2 = .03$ ($p > .05$).

* $p < .05$.

Table Six

Summary of Simultaneous Regression Analysis for Variables Predicting Hours of Total Public Affairs Programming (N = 112).

Variable	B	SE B	Beta
Station revenues (000)	.00002	.00	.17
UHF or VHF (0 = UHF; 1 = VHF)	.59	.79	.08
Big 4 affiliate (0 = No; 1 = Yes)	2.53	1.38	.29
Other network affiliate (0 = No; 1 = Yes)	-.66	1.17	-.07
Television households (000)	-.001	.001	-.24
Average household income (000)	-.00003	.00	-.04
Minority population (%)	.01	.02	.03
Public TV stations	-.13	.31	-.05
Cable penetration (%)	.02	.04	.04
Commercial TV stations	.47	.15	.46**
Constant	-1.76	4.23	

Note. Adjusted R^2 = .23 ($p < .05$).

** $p < .01$.

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2

A Methodological Evaluation of the NAB Report

entitled

"A National Report on the Broadcast Industry's Community Service"
(April 1998)

Presented to:

People for Better TV

Prepared by:

Project on Media Ownership
New York University

January 24, 2000

A Methodological Evaluation of the NAB report entitled "A National Report on the Broadcast Industry's Community Service" April 1998

Executive Summary

This NAB report entitled *A National Report on the Broadcast Industry's Community Service- April 1998* concludes that radio and television stations donated at least $6.85 billion dollars to improve community life. The timespan for this estimate is over the 12 months from August 1, 1996 to July 31, 1997.

The breakdown of the $6.85 billion is categorized into three categories as follows:

Projected value of PSA airtime donated	**$ 4.6 billion**
Projected amount raised for charities/causes	**$ 2.1 billion**
Projected value of free airtime for Debates, Candidate Forums and Convention Coverage	**$148.4 million**

Both from a "thousand foot" perspective and a more detailed examination into the quantification of the above categories, the methodology the researchers used to arrive at the $6.85 billion dollar figure is subject to debate. In some cases, there are methological flaws in deriving these estimates. In other cases, methodology, and associated assumptions used might have been reasonable, but these were not detailed or defended. As a result, the validity of the conclusions in this report is in question.

On an overall basis, the survey itself and the results that were extrapolated had the following methodological flaws:

- The survey was self-reported, which could skew it toward broadcasters that are more supportive of community service than the norm.
- Answers in the survey were not verified by an independent party against the broadcasters internal records. Thus, survey results are highly subjective.
- There was no analysis deriving the appropriate sample size needed to give the results a high degree of validity.
- There is a comparison problem in that both broadcasters and networks were included in the survey, both of which are different types of corporate entities in size and goals.
- There was not a breakdown of non-networked owned broadcasters and network-owned. This breakdown would have assisted in seeing the community service activities of different types of broadcasters.
- In the first two categories above (PSAs and Charities/Causes), the report says that the estimates are estimates of all broadcasters that received the survey extrapolated from those that completed the survey; in the third category (Debates, Candidates and Convention Coverage) the estimate is for <u>all</u> broadcasters and not those that received the survey. The NAB offers no explanation as to this

difference in extrapolating to different populations or in the first case, the relevance of extrapolating to those that received the survey.

Drilling down to the more specific level, there are the following methodological flaws in the three community service categories that are quantified:

Projected Value of PSA Airtime Donated

To project the value of PSA airtime donated, the NAB multiplies the run-of-station rate by the average (or median) number of PSAs that broadcasters air. The usage of both multiples have methodological flaws:

- Rate NAB uses the run-of-station price to estimate the value of donated air-time and not the price of the ad time when the PSAs actually ran. The run-of-station rate is the price an advertiser pays per ad to run many ads throughout all broadcasting times--both prime time hours and non-prime time hours. Thus, the run-of-station rate is an average of prime time and non-prime time rates. Most PSAs are run in non-prime-time hours where the rate is lower. Since the NAB is using the blended run-of-station rate, this figure is higher than the actually rate charged when the PSAs air. Even if the NAB were to claim that many of the PSAs are aired in prime time, it would have been more accurate to have the broadcasters report the time of day the PSAs actually ran and what the corresponding rates were at that time.
- Number of PSAs There is an inconsistency in measurement for the networks vs. the broadcasters because the report uses the average number of PSAs for the broadcasters but the median number of PSAs for the networks. There are 4 networks that report and the median can really disguise the range in such a small data set.
- A logical justification is never offered as to why the report extrapolated the $4.6 billion in this category to all broadcasters that received the survey from the data of broadcasters that actually completed the survey.

Projected Amount Raised for Charities/Causes

- A logical justification is never offered as to why the report extrapolated the $2.1 billion in this category to all broadcasters that received the survey from the data of broadcasters that actually completed the survey.
- The NAB concludes that the amount raised annually from broadcasters increases with the population it serves but the NAB does not conclude that the larger the broadcaster's population, the less that broadcaster spends per member of the population on charity fundraising. If the NAB had taken their analysis one more step, they would have have come to this latter correct conclusion.

Projected Value of Free Airtime for Debates, Candidate Forums and Convention Coverage

- In quantifying this category, the NAB does not state how it calculated the value of the air-time devoted to these political causes so we do not know if the quantification is valid.
- The NAB offers no justification as to how or why it extrapolates the $148.4 million estimate in this category to all broadcasters from the data of broadcasters that actually completed the survey. In the other parts of the survey, they did not extrapolate to all broadcasters but rather just to those that received the survey.

Local Issues Guide Broadcasters section

Statistics Regarding Participation Rates in On-Air Community Service Campaigns and Off-Air Station Involvement

In addition to the quantification exercise above, in a section entitled "Local Issues Guide Broadcasters" the NAB reports non-monetary statistics regarding broadcasters' on-air community service campaigns and off-air station involvement. The NAB defined on-air support community service as local news broadcasts, PSAs or public affairs programming. Some of this on-air community service included on-air disaster reporting, involvement with local businesses in community service campaigns and consultation with local community leaders. Off-air station involvement was defined in a highly-inclusive way in that it included involvement in aiding the victims of disasters, donation drives, local community events, county fairs, and service organizations and their activities.

For on-air community service and off-air station involvement, the NAB reports a percentage of TV and radio stations that are involved in the above activities and does not make an attempt to quantify these activities either in airtime minutes or dollar terms. Thus, through the percentages, we get a sense of how many stations engaged in this type of community service—even if only one time--but not an indication as to the real scale of these efforts. The average number of minutes or average value of on-air community service was not reported nor was the value of off-air involvement pinpointed in dollar terms or time spent. Rather, the NAB reported only whether or not broadcasters ever did these activities, so broadcasters that engaged in these activities only once were included in the percentages of broadcasters that said they performed these activities. There is no reporting that gives a sense of scale or broadcaster's commitment to on-air community service campaigns and off-air station involvement.

Last, in this section, the NAB considers activities like donation drives and county fairs as part of broadcasters' community service. Activities such as these are part of any corporation's obligation to be a good corporate citizen and are not specific to broadcasters. Instead, the broadcasters real contribution to what we deem as broadcaster community service should only be tabulated in terms of donated airtime, both in the value of the air-time and the community benefits the air-time produces.

Overall Perspective of The Report

Serious Study or Public Relations Brochure?

The aim of the report seems to be to positively portray the community service efforts of the broadcasters rather than attempt a serious analysis of the data the broadcasters are reporting. The study appears to be more of a public relations brochure than an objective study. The report is filled with over 17 pages of anecdotal examples as opposed to only one page describing the research methodology.

Self-Reporting

The data was self-reported by broadcasters and it is un-audited in that there was not an independent certified public accounting firm or other appropriate independent party reviewing the data for accuracy and consistency. Thus, we do not know if the broadcasters interpreted the questions in a similar way or checked their records to verify their actual participation in community service during the year surveyed. The recollections of the party filling out the survey at the TV or radio station could have been inaccurate but there was no auditing entity to verify the survey answers.

When studies are based on self-reported data, the results tend to be skewed because self-reporting usually attracts parties that are reporting in the affirmative. Broadcasters that are assisting the community would have an interest in reporting and probably due to their commitment, they would be more likely to have staff involved in the community service efforts that could spend time filling out the survey. Stations that did not return the survey might not have done so because they do not have staff involved in community service efforts or a commitment to community service. In the same vein, individual state broadcaster associations distributed the survey, which also skews the results in that industry "insiders" were managing the distribution. It stands to reason that the associations that are more committed to community service would manage the process so that the surveys of their constituents were completed thereby again skewing the results in the affirmative.

Sample Size

There is no calculation, using common statistical tools, of the appropriate sample size that would make this report valid. The overall response rate for the project was 42% with the completion rate among television stations at 63%, 100% among the networks and 39% for radio. (The report did not give a breakdown between non-network owned TV stations and network .)_The NAB report claims this response rate is unusually high; even among association members most mail surveys tend to fall in the 20% to 30% response range. However, a high response rate does not indicate validity of a sample size. However, the NAB did send the completed surveys to Public Opinion Strategies, an Alexandria-based research firm, to be tabulated and analyzed. Was this research firm an independent party? The report gives no evidence on this matter

Extrapolation

The NAB includes both the four major networks and typical television stations in their quantifications. The inclusion of data derived from both networks and typical TV stations probably "corrupts" the conclusions and the extrapolations because networks are different operationally from typical television stations and so including the data of both in the same conclusion is flawed. It is like collecting data on both apples and oranges and making conclusions.

An indication of the differences in the survey results of the networks and the typical television stations is in the reported weekly PSAs. The report says that the typical television station runs an average of 137 PSAs a week and the four networks run a median of 41 PSAs per week. These numbers are very far apart and would affect the margin of error in prediction and extrapolation. Thus, the inclusion of both network data and the broadcaster data in the data set probably is the reason for 95% confidence level vs a higher 98% confidence level (confidence within two standard deviations) or 99.7% confidence level (confidence within three standard deviations. In other words, the 95% confidence level is high but the extrapolation would be more valid at the higher confidence level. However, the 95% might be an appropriate confidence level for this type of survey but no evidence is offered and the report does not pinpoint the reason for this confidence level. Is it due to the fact that networks had higher community service activities or it is because the overall data reported has this variance?

Methodologies Used in the Three Community Service Categories

The methodologies and assumptions the NAB uses in quantifying the three separate categories of community service can be contested as follows:

Public Service Announcement (PSA) Air Time Donated-estimated $4.6 billion

In quantifying the value of PSAs, the NAB report uses the average run-of-station charged for a 30 second spot multiplied by the total number of spots. Usage of the run-of-station rate can be contested because this is an average of all ad time slots available in a 24-hour period. The stations do not normally air PSAs during prime time, when audiences and rates are at their highest, because these spots are usually filled to capacity with paid advertising at the highest rates. PSAs are usually made during non-primetime and are "filler spots" that are used in lieu of unsold paid advertising spots. For this reason, PSAs are most often seen on late night TV or on weekend mornings. This analysis is similar for the total value of radio PSAs which is quantified using an average rate and not the lower rate in effect when the PSAs are usually aired.

In addition, the report extrapolates out a figure of the value of donated PSA air-time to all stations that received the survey. Why extrapolate out to those that merely received the survey--why not extrapolate out to all stations if the NAB feels their 95% confidence level makes extrapolation accurate?

There is a mix of metrics report with respect to television stations. The four networks reported a median number of 41 PSAs while the typical TV station ran an average of 137 per week. There is an inconsistency in using the median number for the networks' reporting of PSAs. The median is either the middle number or the average of the two middle numbers in a data set. In a data set of four networks, 41 is the average of the two middle numbers but 41 does not tell us much because mathematically the lower numbers in the data set could be 0 and 0 and there could still be a median of 41 if the third data point is 82 [(82 + 0)/2 = 41]. Is there something in the network reporting that needed to be disguised by using the median number? There could be a reasonable case for using the median, but the NAB doesn't make a case in the text.

Amount Raised for Charities/Causes-estimated at $2.1 billion

Similar to the analysis of the value of PSA air-time donated, the report uses extrapolation to calculate a total figure for the 12 month period surveyed of $2.1 billion, this total being attributable to stations who were mailed a survey and not all stations.

The NAB cites that "As one might reasonably expect, the amount raised for charitable causes also increases with the population it serves." This comment is written in relation to a chart on page 7 which is represented below:

Residents	**Under 25,000**	**25,000-75,000**	**75,000-1 mil**	**Over 1 mil**
Average Raised	**$25,600**	**$90,200**	**$165,000**	**$404,200**

The NAB's claim of reasonable expectation is not reasonable because this chart shows that the average dollars raised per person in the population served actually declines if we do this calculation using the mean number of residents in the population categories:

Average Residents	**12,500**	**50,000**	**87,500**	**Cannot calculate**
Average Raised	**$25,600**	**$90,200**	**$165,000**	**$404,200**
Amt Raised/Person in Population Served	**$2.05**	**$1.80**	**$0.31**	**?**

In the far right column, we can calculate an amount raised per person in the population served if we assume that some broadcaster serve a population as high as 5 million. We can then take average of 1 million and 5 million, which is 3 million and divide it by the

average raised of $404,200, which would bring the amount raised/per person in the highest population served to 13 cents.

One might reasonably expect that the since broadcasters with larger populations can charge higher rates for advertising spots and have the ability to be more profitable, they would at least spend the same per person on charitable causes as the broadcasters with the lower coverage area. It appears that the NAB has presented these numbers for charity money raised without the true analysis as it relates to the broadcasters with the larger populations.

Projected Value of Free Airtime for Debates, Candidate Forums and Convention Coverage—estimated at $148.4 million

In making the $148.4 million estimate, the NAB does not give any clue as to how they calculated the value of the air-time. Did the broadcasters make their own estimate or did the NAB assign a value itself to the airtime? One is left to guess.

The NAB also reports percentages of broadcasters that ran specific segments in the political arena. For example they report that 54% of all broadcasters aired a segment profiling candidates or their issue/stands. Reporting a percentage in this way does not give an indication as to the scale of this type of coverage. Broadcasters that aired only one candidate profile lasting only 30 seconds would be included in the 54%. In the same vein, many of the broadcasters included in the 54% may have only aired a few short segments; it is impossible to determine the scale and impact from this type of percentage data.

The NAB offers no justification as to how or why they extrapolate the $148.4 million estimate in this category to *all* broadcasters from the data of broadcasters that actually completed the survey. In the other parts of the survey, they did not extrapolate to all broadcasters but rather just to those that received the survey.

Local Issues Section of Report (entitled *Local Issues Guide Broadcasters)*

In addition to quantifying community service, the NAB report surveyed broadcasters about their on-air community service campaigns whether through local news broadcasts, PSAs or public affairs programming or off-air activities to aid the victims of disasters. The NAB reported the percentage of broadcasters that undertook these activities as 66% of TV stations and 68% of radio stations. It was not stated whether these percentage resulted from broadcasters that completed the survey, those that received the survey or all broadcasters. In addition, the PSAs were already quantified in the report in the $6.85 total community service estimate so it seems odd to include them in this category as well.

Methodologically, the NAB reported the percentage of stations that did this on-air community service within the 12 months surveyed but they did not report what percentage of total airtime on average was devoted to this type of programming. One would be especially interested in the amount of programming, reported in a metric such

as minutes, that is done during prime time which has the greatest audience and would therefore give community service programs the greatest reach.

The NAB also reports the percentage of stations which covered specific issues such as aids or alcohol abuse in a PSA, locally-produced public affairs program or news segment. For the nine issues surveyed, the percentages of stations that covered an issue was over 70% in every case and as high as 94% in the highest case. Again, what was the time devoted in minutes? The way this is reported a broadcaster could have aired one PSA or one public affairs program on one issue and the broadcaster would be accounted for in these percentages.

Toward the end of this Local Issues section, the NAB reports that "more than eight in ten broadcast stations involve local businesses in their community service campaigns." The report does not denote whether these stations are those that completed the survey *or* an extrapolation of those that received the survey *or* all stations. This is a bit vague--how is "involvement" defined? Are the businesses involved in such a way that it truly benefits the community? It would be interesting to have an estimate of monetary value that the broadcasters are soliciting from local businesses for the community or conversely, an estimate of the value of the benefit to the local business of the broadcasters' efforts.

In the last paragraph of the Local Issues section, the NAB cites that "more than 75% of stations say they consult with local community leaders in deciding which issues and causes to address." Again, the report does not denote whether these stations are those that completed the survey *or* an extrapolation of those that received the survey *or* all stations. As important, who are these so-called "community leaders" that have been consulted? The report does not define the term "community leader" and are these "community leaders" the people that can really add the appropriate input into a station's community service program? These "community leaders" might be self-interested--vested in certain political factions or specific charities--and therefore their advice might not objective and useful.

3

The Project on Media Ownership

people for better tv

Findings from a National Survey

Lake Snell Perry & Associates
May 1999

Methodology

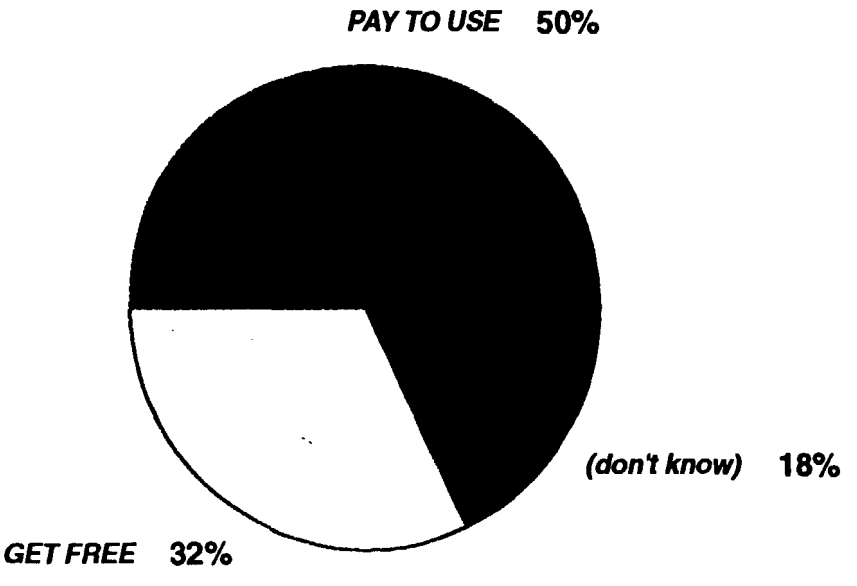
This report is based on a national survey conducted by Lake Snell Perry & Associates for the Project on Media Ownership.

Lake Snell Perry & Associates designed and administered this survey which was conducted by telephone using professional interviewers. The survey reached a total of 1400 adults nationwide age 18 years or older, who indicated they are registered to vote and likely to vote in the 2000 general election, including oversamples of 200 African American respondents and 200 Hispanic respondents. The survey was conducted between April 6-11, 1999.

Telephone numbers for the survey were drawn from a random digit dial sample (RDD). The sample was stratified geographically by state based on the population in each region. The oversamples were weighted into the base sample so that the oversampled group reflects its actual contribution to the total population. The sample size with these weights applied is 1000 cases. The data were weighted by race, age, gender, and education to ensure the sample is an accurate reflection of the population. The margin of error for this survey is +/-3.1%. The sampling error for subgroups is greater.

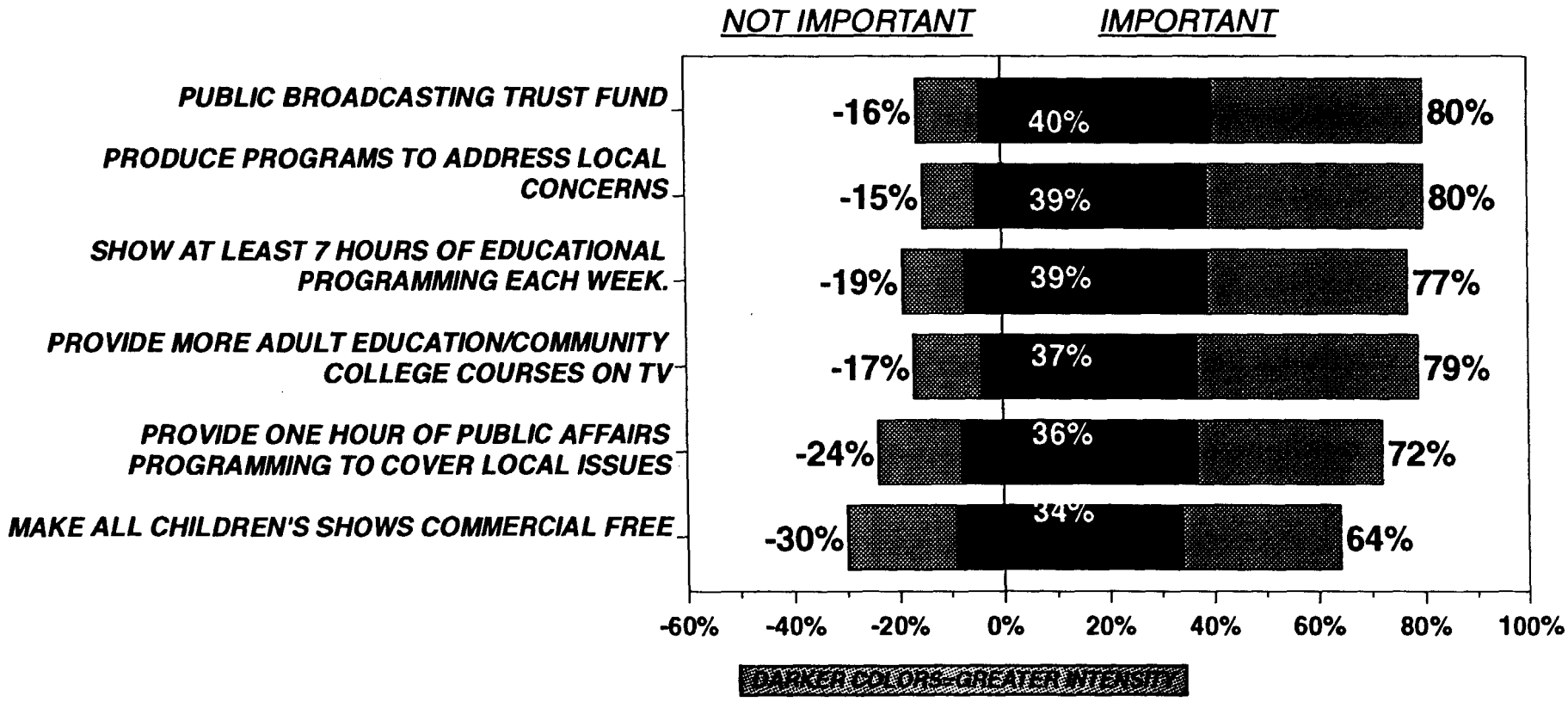
Two-thirds of voters are unaware that broadcasters use the airwaves for free. Half mistakenly believe they pay for this access.

As you may know, television broadcasters need access to the airwaves in order to broadcast their programs. They get that access from the Federal Communication Commission, or FCC. Do you think that broadcasters pay to use these airwaves or do you think they get to use them for free?



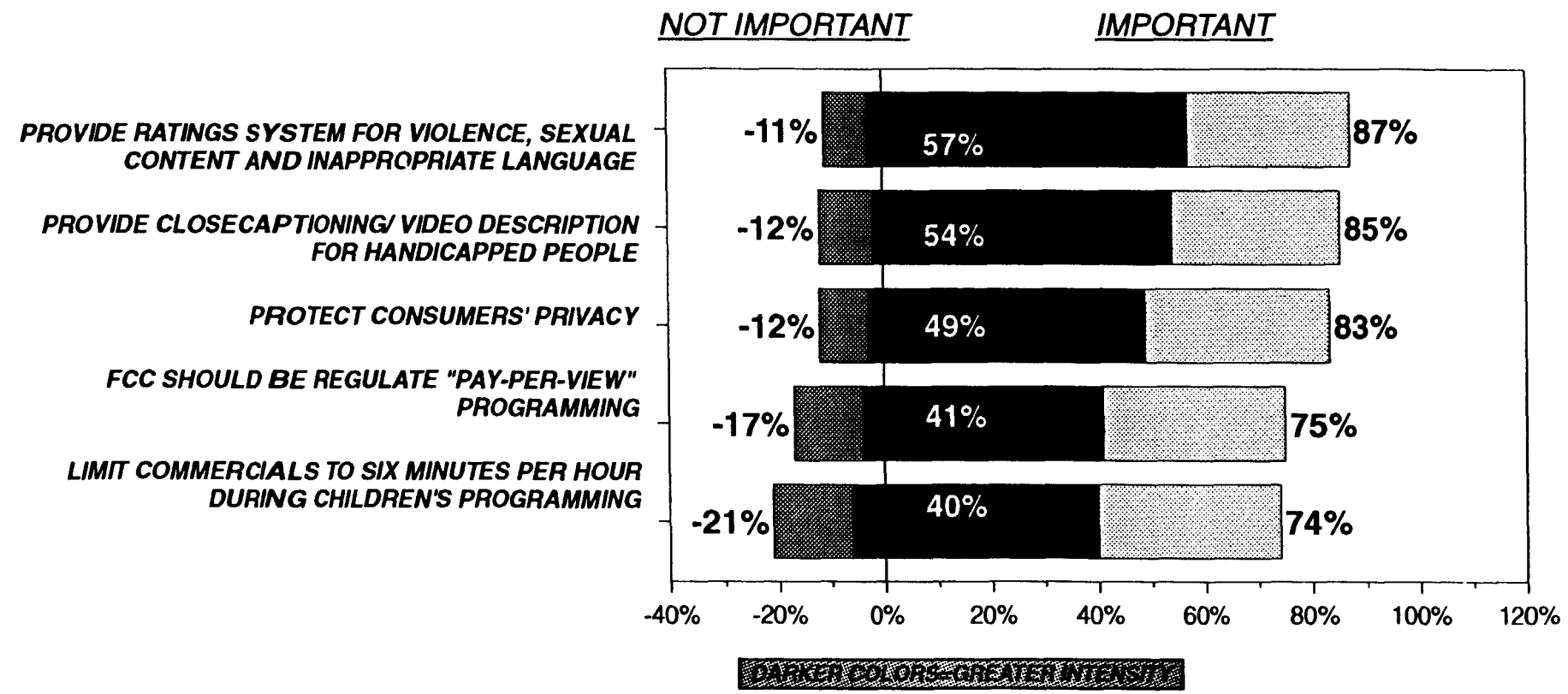
Other important proposals include broadcasters paying into a trust fund and various proposals to increase local, educational, and public affairs programming, and put limits on commercials.

As you may know, the Federal Communications Commission recently GAVE broadcasters access to FREE additional public airwaves in order to a develop new technology called digital television. The public now has an opportunity to say what broadcasters should give back to the public in return for free use of the airwaves. I am going to read you a number of public service proposals on the part of broadcasters in for the free use of public airwaves. Please tell me how IMPORTANT each one is to you personally.



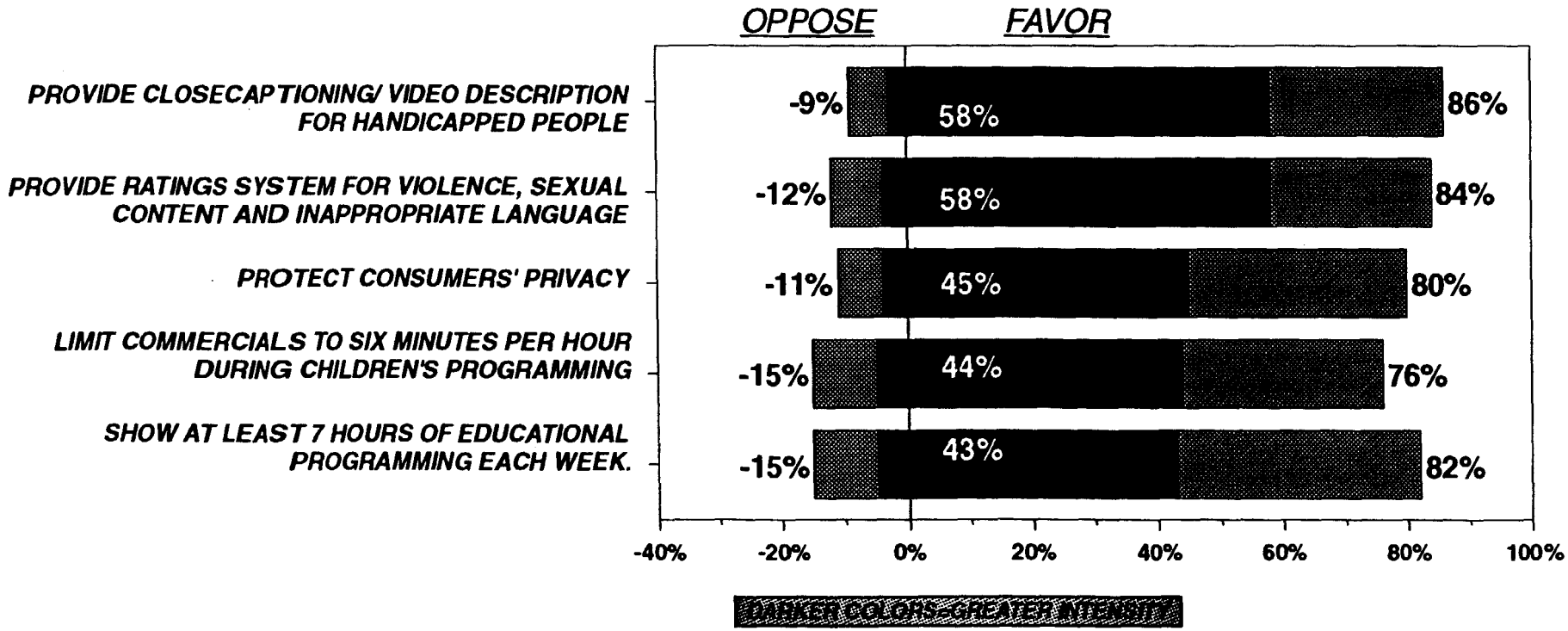
Every proposal tested about broadcasters' debt to the public gains at least majority support. The proposals voters find most important include providing a ratings system, close-captioning, protecting consumers' privacy, regulating pay-per-view, and more local programming.

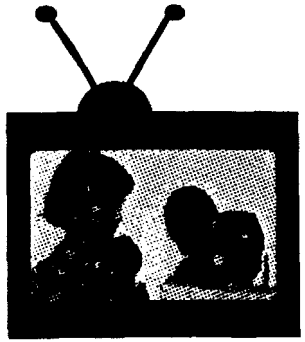
As you may know, the Federal Communications Commission recently GAVE broadcasters access to FREE additional public airwaves in order to a develop new technology called digital television. The public now has an opportunity to say what broadcasters should give back to the public in return for free use of the airwaves. I am going to read you a number of public service proposals on the part of broadcasters in for the free use of public airwaves. Please tell me how IMPORTANT each one is to you personally.



Additionally, voters are intensely favorable toward these proposals, specifically close-captioning, a ratings system, protecting consumers' privacy, requiring more educational programming, and limiting commercials.

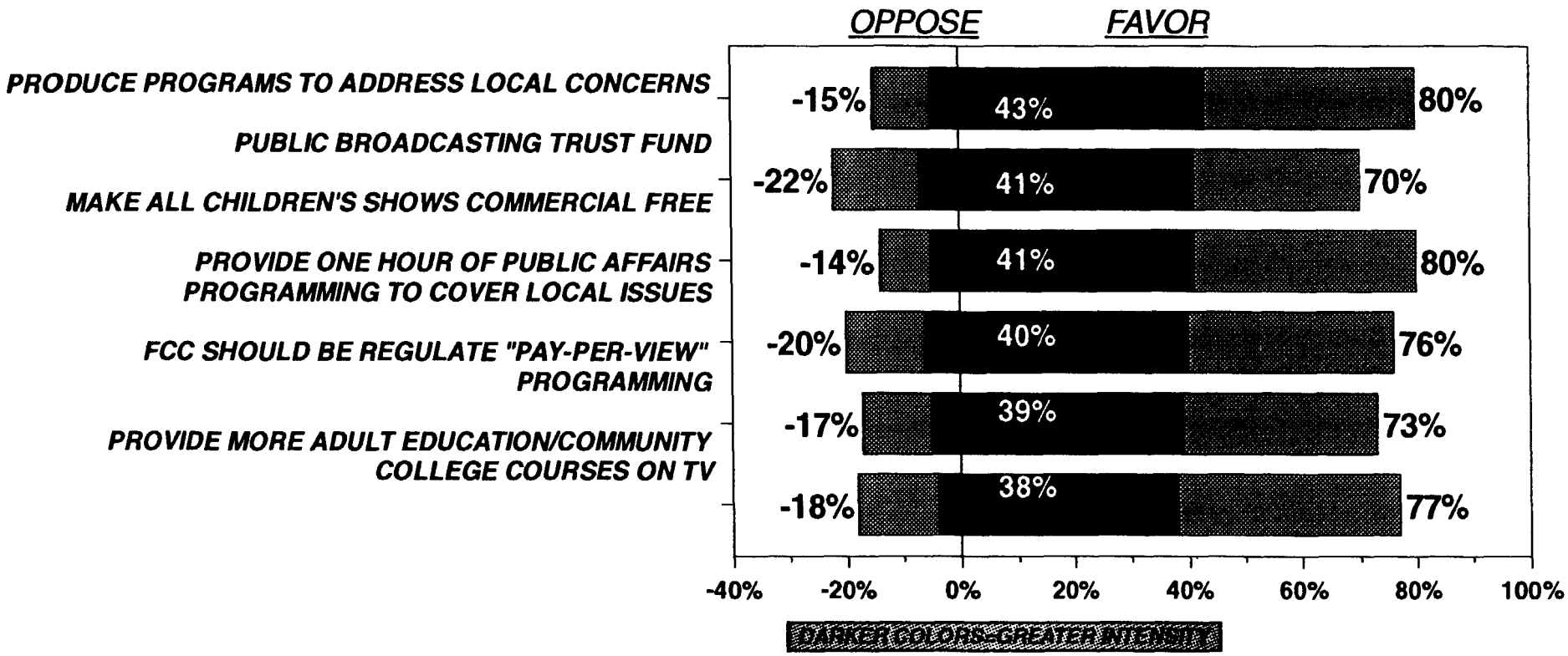
As you may know, the Federal Communications Commission recently GAVE broadcasters access to FREE additional public airwaves in order to a develop new technology called digital television. The public now has an opportunity to say what broadcasters should give back to the public in return for free use of the airwaves. After I read each one, please tell me whether you would strongly favor, somewhat favor, somewhat oppose or strongly oppose each of the following proposals.

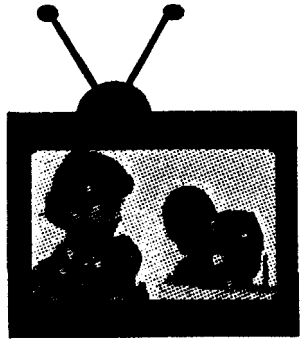




Producing programming which addresses local concerns, making children's shows commercial free, and providing more adult educational and local public affairs programming are a strong second tier of proposals.

As you may know, the Federal Communications Commission recently GAVE broadcasters access to FREE additional public airwaves in order to a develop new technology called digital television. The public now has an opportunity to say what broadcasters should give back to the public in return for free use of the airwaves. After I read each one, please tell me whether you would strongly favor, somewhat favor, somewhat oppose or strongly oppose each of the following proposals.





Proposals to provide more public service announcements and more non-English language programming are less popular with voters.